

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

GEORGE BOYD, et al.  
*individually and on behalf of all  
others similarly situated,*

Plaintiffs,

v.

LAW OFFICES OF SHAPIRO, BROWN, &  
ALT, LLP, et al.,

Defendants.

Civil Action No. 3:12cv700

**DECLARATION OF IDA BEVERLEY**

I, Ida Beverley, am above the age of 18 years, am of sound mind and body, and I hereby state, under penalty of perjury, as follows:

1. I am a resident of the City of Richmond, Virginia.
2. The property that I live at and which forms the basis for this lawsuit against the Defendants is located at 3303 Jeter Avenue, which is located in the City of Richmond and the Richmond Division of the Eastern District of Virginia.
3. I am currently employed in Richmond. I work from 8-4:30 Monday through Friday.
4. It would be very difficult for me to get enough time off of work to travel to the Norfolk Division in order to offer testimony regarding this case. The federal courthouse in Norfolk is approximately two hours away from where I live, not including traffic. As I would have to drive through the Hampton Roads Bridge Tunnel to get to the courthouse, my actual travel time would probably be closer to two and a half or three hours.
5. The federal courthouse in Richmond is only about fifteen minutes from my home. It would be very easy for me to travel to the courthouse to offer my testimony during trial.
6. I also intend to call several witnesses located in the Richmond Division to support my case against the Defendants.
7. For example, I intend to offer the testimony of my husband, Warren Beverley. My husband knows about the material facts relevant to my foreclosure, including our attempts to obtain a modification, the communications that we received from the Defendants, and the damages that we suffered as a result of the attempted foreclosure on our home. My husband lives



with me in Richmond. Because he suffers from health issues, it would be difficult for him to travel to Norfolk in order to offer his testimony.

8. I will also seek to offer the testimony of employees from the Housing & Urban Development Office ("HUD") regarding my FHA mortgage loan in support of my claims. The only HUD office in Virginia is located in Richmond at 600 East Broad Street, Third Floor, Richmond, VA 23219-4920.

9. I also intend to seek the testimony of a Loan Processing Services representative to support my claims. LPS has in office in the Richmond Division of the Eastern District of Virginia at 5640 Cox Road, Glen Allen, Virginia 23060.

10. Additionally, many of the documents pertaining to my foreclosure are located in the Richmond Division, including the land records pertaining to my foreclosure, which are located at the Richmond City Circuit Court.

11. It is my preference that my case be litigated in the Richmond Division, as it is far more convenient for me.

Under penalty of perjury under the laws of the United States of America, I hereby declare and affirm that the foregoing information is true and correct to the best of my information, knowledge and belief.

Dated: 01/26/13 \_\_\_\_\_

  
IDA BEVERLEY